



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

MAR 20 2018

OFFICE OF
COMPLIANCE AND ENFORCEMENT

Reply To: OCE-101

Mr. Brad Osborne, President
Northern Oilfield Services, Inc.
P.O. Box 340112
Prudhoe Bay, Alaska 99734

Re: **NOTICE OF VIOLATION**
Northern Oilfield Services, Inc.
EPA ID No. AKR 00000 4994

Dear Mr. Osborne:

This Notice of Violation (NOV) is to inform Northern Oilfield Services, Inc. (hereinafter NOSI or facility) of violations of the Resource Conservation and Recovery Act (RCRA) as amended. These violations were identified as a result of an inspection performed by the U.S. Environmental Protection Agency (EPA) on July 10, 2017, at Northern Oilfield Services, Inc., located at 1001 Airport Way, Prudhoe Bay, Alaska 99734. The inspection was performed pursuant to EPA's inspection authority under Section 3007 of RCRA, 42 U.S.C. § 6927.

From the observations made during the inspection, the following RCRA violations were identified at the facility:

Violation 1 - Failure to make a hazardous waste determination

40 C.F.R. § 262.11 requires that a person who generates a solid waste, as defined in 40 C.F.R. § 261.2, must determine if that waste is a hazardous waste.

At the time of inspection, in the Tote Barn area, the inspector observed a 55-gallon container that contained contaminated soil. The label on the container indicated that the content is "Coolant Contaminated Soil waiting for classification" and dated July 2, 2016. Mr. Wing stated he didn't know anything about the container or its contents. NOIS failed to make a hazardous waste determination at the point of generation as required by 40 C.F.R. §262.11.

Violation 2 - Failure to close containers of universal waste lamps

The regulation at 40 C.F.R. § 273.13(d)(1) requires a small quantity handler of universal waste lamps to manage the lamps in containers or packages that remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable circumstances.

At the time of the inspection, in the Sewage Treatment Building area, the inspector observed an 8-foot box that contained 21 waste fluorescent lamps. The box was labeled with the words "Universal Waste" and one end of the box was open. The inspector also observed a 4-foot box that contained 30 waste

fluorescent lamps. The box was labeled with the words "Universal Waste" and the top of the box was open. NOSI failed to close universal waste lamp containers.

Violation 3 - Failure to meet universal waste accumulation time limits

The regulation at 40 C.F.R. § 273.15 states a small quantity handler of universal waste may accumulate universal waste for no longer than one year from the date the universal waste is generated, or received from another handler.

At the time of the inspection, July 10, 2017, in the Parts Room area, the inspector observed a container with waste alkaline batteries. The container was labeled with the words "Universal Waste Batteries" and the date of August 31, 2015. In the Sewage Treatment Building area, the inspector observed an 8-foot box that contained 21 waste fluorescent lamps. The box was labeled with the words "Universal Waste" and the date of April 1, 2016. The inspector also observed a 4-foot box that contained 30 waste fluorescent lamps. The box was labeled with the words "Universal Waste" and dated December 1, 2016. Finally, the inspector observed a 10-gallon poly container labeled with the words "Universal Waste" and the date of February 5, 2016. This poly container contained high pressure sodium and metal halide bulbs. Therefore, all four containers had been accumulated for longer than one year.

Required Action

The above violations may subject NOSI to enforcement action under Section 3008 of RCRA, including the assessment of civil penalties. Within twenty (20) days of receipt of this NOV, EPA requests that you submit a written response and/or photographs that identify actions you have taken or will take to correct the violations.

Please send all material submitted in response to this NOV to Xiangyu Chu by email at chu.xiangyu@epa.gov, or:

Ms. Xiangyu Chu
U.S. Environmental Protection Agency
RCRA Enforcement Unit, OCE-101
1200 Sixth Avenue, Suite 900
Seattle, WA 98101

EPA Reservation of Rights

Notwithstanding this NOV or your response, EPA reserves the right to take any action pursuant to RCRA or any other applicable legal authority. Your response to this NOV does not constitute compliance with RCRA.

Nothing in this NOV or your response shall affect duties, obligations or responsibilities with respect to NOSI under local, state, or federal law or regulation.

Thank you for your prompt attention to this important matter. If you have questions regarding this NOV, please contact Xiangyu Chu of my staff at (206) 553-2859 or chu.xiangyu@epa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Edward J. Kowalski", with a stylized flourish at the end.

Edward J. Kowalski
Director

cc: Mr. John Wing
Operations Manager